

TIMOTHY COURCHAINE  
United States Attorney  
District of Arizona  
AMY C. CHANG  
Arizona State Bar No. 027566  
RAYMOND K. WOO  
Arizona State Bar No. 023050  
M. BRIDGET MINDER  
Arizona State Bar No. 023356  
Assistant United States Attorneys  
Two Renaissance Square  
40 N. Central Ave., Suite 1800  
Phoenix, Arizona 85004  
Telephone: 602-514-7500  
Email: amy.chang@usdoj.gov  
Email: raymond.woo@usdoj.gov  
Email: bridget.minder@usdoj.gov

JOHN EISENBERG  
Assistant Attorney General  
National Security Division  
LESLIE C. ESBROOK  
New York State Bar No. 5406301  
District of Columbia Bar No. 1670737  
CHRISTOPHER M. COOK  
District of Columbia Bar No. 90013354  
Trial Attorneys  
Counterintelligence and Export Control Section  
950 Pennsylvania Ave, NW  
Washington, DC 20530  
Email: [Leslie.Esbrook@usdoj.gov](mailto:Leslie.Esbrook@usdoj.gov)  
Email: [Christopher.Cook7@usdoj.gov](mailto:Christopher.Cook7@usdoj.gov)  
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

VS.

## 1. Abraham Chol Keech

CR-24-00394-PHX-SPL-001

## **PLEA AGREEMENT**

Plaintiff, United States of America, and the defendant, Abraham Chol Keech,  
hereby agree to resolve this matter on the following terms and conditions:

1      **1. PLEA**

2      The defendant will plead guilty to Count 1 of the superseding indictment charging  
3      the defendant with Conspiracy to Violate the Arms Export Control Act (AECA) and the  
4      International Traffic in Arms Regulations (ITAR), in violation of Title 18, United States  
5      Code, Section 371, a Class D felony offense; and Count 2 of the superseding indictment  
6      charging the defendant with Conspiracy to Violate the Export Control Reform Act (ECRA)  
7      and the Export Administration Regulations (EAR), in violation of Title 50, United States  
8      Code, Sections 4819(a)(1), (a)(2)(D), and (b); and Title 15, Code of Federal Regulations,  
9      Parts 736.2(b)(1) and 774, Supp. No. 1, a Class C felony offense.

10     **2. MAXIMUM PENALTIES**

11     a.      A violation of 18 U.S.C. § 371 is punishable by a maximum fine of \$250,000,  
12     a maximum term of imprisonment of five years, or both, and a term of supervised release  
13     of three years. A violation of 50 U.S.C. § 4819(a)(1), (a)(2)(D), and (b); and 15 C.F.R.  
14     Parts 736.2(b)(1) and 774, Supp. No. 1, is punishable by a maximum fine of \$1,000,000, a  
15     maximum term of imprisonment of twenty years, or both, and a term of supervised release  
16     of three years. A maximum term of probation on both counts is five years (including a  
17     minimum term of one year if probation is imposed).

18     b.      According to the Sentencing Guidelines issued pursuant to the Sentencing  
19     Reform Act of 1984, the Court shall order the defendant to:

20        (1)     make restitution to any victim of the offense pursuant to 18 U.S.C.  
21     § 3663 and/or 3663A, unless the Court determines that restitution would not be  
22     appropriate;

23        (2)     pay a fine pursuant to 18 U.S.C. § 3572, unless the Court finds that a  
24     fine is not appropriate;

25        (3)     serve a term of supervised release when required by statute or when a  
26     sentence of imprisonment of more than one year is imposed (with the understanding that  
27     the Court may impose a term of supervised release in all other cases); and

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(4) pay upon conviction a \$100 special assessment for each count to which the defendant pleads guilty pursuant to 18 U.S.C. § 3013.

c. The Court is required to consider the Sentencing Guidelines in determining the defendant's sentence. However, the Sentencing Guidelines are advisory, and the Court is free to exercise its discretion to impose any reasonable sentence up to the maximum set by statute for the crime(s) of conviction, unless there are stipulations to the contrary that the Court accepts.

### **3. AGREEMENTS REGARDING SENTENCING**

a. **Stipulation: Agreement Contingent on Plea by Co-Defendant:** Pursuant to Fed. R. Crim. P. 11(c)(1)(C), the parties agree that this plea agreement is contingent on a guilty plea being entered by co-defendant, Peter Biar Ajak, and Ajak's guilty plea being accepted by the Court. The defendant understands that if Ajak does not accept his plea agreement for any reason or does not enter a guilty plea, the United States may, but is not required to, withdraw from this plea agreement with the defendant, in which case the parties would not be bound by the terms of this plea agreement, including the stipulations, recommendations, or other agreements herein, or any of the facts contained in the factual basis. If Ajak withdraws his guilty plea, or if the Court rejects Ajak's guilty plea, the United States may, but is not required to, withdraw from this plea agreement with the defendant. Only the United States, not the defendant, may elect to withdraw from this plea agreement.

b. **Stipulation: Ineligibility for Adjustment for Certain Zero-Point Offenders**  
Pursuant to Fed. R. Crim. P. 11(c)(1)(C), the United States and the defendant stipulate that the defendant is not eligible for a downward adjustment pursuant to U.S.S.G. § 4C1.1(a)(7), as defendant's offense involved possessing, receiving, purchasing, transporting, or transferring a firearm or other dangerous weapon (or inducing another person to do so).

c. **Stipulation: High-End Cap.** Pursuant to Fed. R. Crim. P. 11(c)(1)(C), the United States and defendant stipulate that the defendant's sentence shall not exceed the

1 high end of the sentencing guidelines range as calculated under U.S.S.G. § 1B1.1(a). This  
2 stipulated sentencing cap will not change based on departures considered under U.S.S.G.  
3 § 1B1.1(b). Nothing in this agreement shall preclude defendant from moving for a  
4 downward departure, variance, or sentence below the stipulated cap, or the court from  
5 imposing a sentence below the stipulated cap.

6       d. Stipulation: Foreign Travel During Supervised Release. Pursuant to Fed. R.  
7 Crim. P. 11(c)(1)(C), the United States stipulates that if, during his term of supervised  
8 release, the defendant requests permission from the Court and/or the U.S. Probation Office  
9 to leave the United States to return to Uganda and/or another country he has appropriate  
10 status to enter, the government will not oppose such a request, provided that the defendant  
11 (1) complies with the conditions of his supervised release regarding obtaining approval  
12 before leaving the judicial district; and (2) has not violated any other terms of his  
13 supervised release at the time he seeks permission to travel. If the defendant returns to the  
14 United States during the term of his supervised release, he must report to his probation  
15 officer within 72 hours of returning to the United States.

16       e. Acceptance of Responsibility. If the defendant makes full and complete  
17 disclosure to the U.S. Probation Office of the circumstances surrounding the defendant's  
18 commission of the offense, and if the defendant demonstrates an acceptance of  
19 responsibility for this offense up to and including the time of sentencing, the United States  
20 will recommend a two-level reduction in the applicable Sentencing Guidelines offense  
21 level pursuant to U.S.S.G. § 3E1.1(a). If the defendant has an offense level of 16 or more,  
22 the United States will move the Court for an additional one-level reduction in the applicable  
23 Sentencing Guidelines offense level pursuant to U.S.S.G. § 3E1.1(b).

24       f. Non-Binding Recommendations. The defendant understands that  
25 recommendations are not binding on the Court. The defendant further understands that the  
26 defendant will not be permitted to withdraw the guilty plea if the Court does not follow a  
27 recommendation.

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1           g. Assets and Financial Responsibility. The defendant shall make a full  
2 accounting of all assets in which the defendant has any legal or equitable interest. The  
3 defendant shall not (and shall not aid or abet any other party to) sell, hide, waste, spend, or  
4 transfer any such assets or property before sentencing, without the prior approval of the  
5 United States (provided, however, that no prior approval will be required for routine, day-  
6 to-day expenditures). The defendant also expressly authorizes the United States Attorney's  
7 Office to immediately obtain a credit report as to the defendant in order to evaluate the  
8 defendant's ability to satisfy any financial obligation imposed by the Court. The defendant  
9 also shall make full disclosure of all current and projected assets to the U.S. Probation  
10 Office immediately and prior to the termination of the defendant's supervised release or  
11 probation, such disclosures to be shared with the U.S. Attorney's Office, including the  
12 Financial Litigation Unit, for any purpose. Finally, the defendant shall participate in the  
13 Inmate Financial Responsibility Program to fulfill all financial obligations due and owing  
14 under this agreement and the law.

15           **4. AGREEMENT TO DISMISS OR NOT TO PROSECUTE**

16           a. Pursuant to Fed. R. Crim. P. 11(c)(1)(A), the United States, at the time of  
17 sentencing, shall dismiss Counts 3 and 4 of the superseding indictment as to this defendant  
18 in CR-24-00394-PHX-SPL.

19           b. Additionally, this office shall not prosecute the defendant for any offenses  
20 committed by the defendant, and known by the United States (as detailed in the discovery  
21 provided by the United States to the defendant during this case), in connection with the  
22 charges in the superseding indictment.

23           c. This agreement does not, in any manner, restrict the actions of the United  
24 States in any other district or bind any other United States Attorney's Office.

25           **5. COURT APPROVAL REQUIRED; REINSTITUTION OF PROSECUTION**

26           a. If the Court, after reviewing this plea agreement, concludes that any  
27 provision contained herein is inappropriate, it may reject the plea agreement and give the  
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1 defendant the opportunity to withdraw the guilty plea in accordance with Fed. R. Crim. P.  
2 11(c)(5).

3 b. If the defendant's guilty plea or plea agreement is rejected, withdrawn,  
4 vacated, or reversed at any time, this agreement shall be null and void, the United States  
5 shall be free to prosecute the defendant for all crimes of which it then has knowledge and  
6 any charges that have been dismissed because of this plea agreement shall automatically  
7 be reinstated. In such event, the defendant waives any and all objections, motions, and  
8 defenses based upon the Statute of Limitations, the Speedy Trial Act, or constitutional  
9 restrictions in bringing later charges or proceedings. The defendant understands that any  
10 statements made at the time of the defendant's change of plea or sentencing may be used  
11 against the defendant in any subsequent hearing, trial, or proceeding subject to the  
12 limitations of Fed. R. Evid. 410.

13 **6. WAIVER OF DEFENSES AND APPEAL RIGHTS**

14 The defendant waives (1) any and all motions, defenses, probable cause  
15 determinations, and objections that the defendant could assert to the superseding  
16 indictment or information; and (2) any right to file an appeal, any collateral attack, and any  
17 other writ or motion that challenges the conviction, an order of restitution or forfeiture, the  
18 entry of judgment against the defendant, or any aspect of the defendant's sentence,  
19 including the manner in which the sentence is determined, including but not limited to any  
20 appeals under 18 U.S.C. § 3742 (sentencing appeals) and motions under 28 U.S.C. §§ 2241  
21 and 2255 (habeas petitions), and any right to file a motion for modification of sentence,  
22 including under 18 U.S.C. § 3582(c) (except for the right to file a compassionate release  
23 motion under 18 U.S.C. § 3582(c)(1)(A) and to appeal the denial of such a motion). This  
24 waiver shall result in the dismissal of any appeal, collateral attack, or other motion the  
25 defendant might file challenging the conviction, order of restitution or forfeiture, or  
26 sentence in this case. This waiver shall not be construed to bar an otherwise-preserved  
27 claim of ineffective assistance of counsel or of "prosecutorial misconduct" (as that term is  
28 defined by Section II.B of Ariz. Ethics Op. 15-01 (2015)).

1       7. **DISCLOSURE OF INFORMATION**

2           a.     The United States retains the unrestricted right to provide information and  
3 make any and all statements it deems appropriate to the U.S. Probation Office and to the  
4 Court in connection with the case.

5           b.     Any information, statements, documents, and evidence that the defendant  
6 provides to the United States pursuant to this agreement may be used against the defendant  
7 at any time.

8           c.     The defendant shall cooperate fully with the U.S. Probation Office. Such  
9 cooperation shall include providing complete and truthful responses to questions posed by  
10 the U.S. Probation Office including, but not limited to, questions relating to:

11              (1)     criminal convictions, history of drug abuse, and mental illness; and  
12              (2)     financial information, including present financial assets or liabilities  
13 that relate to the ability of the defendant to pay a fine or restitution.

14       8. **FORFEITURE, CIVIL, AND ADMINISTRATIVE PROCEEDINGS**

15           a.     Nothing in this agreement shall be construed to protect the defendant from  
16 administrative or civil forfeiture proceedings or prohibit the United States from proceeding  
17 with and/or initiating an action for civil forfeiture. Pursuant to 18 U.S.C. § 3613, all  
18 monetary penalties, including restitution imposed by the Court, shall be due immediately  
19 upon judgment, shall be subject to immediate enforcement by the United States, and shall  
20 be submitted to the Treasury Offset Program so that any federal payment or transfer of  
21 returned property the defendant receives may be offset and applied to federal debts (which  
22 offset will not affect the periodic payment schedule). If the Court imposes a schedule of  
23 payments, the schedule of payments shall be merely a schedule of minimum payments and  
24 shall not be a limitation on the methods available to the United States to enforce the  
25 judgment.

26           b.     The defendant agrees to forfeit, and hereby forfeits, all interest in any asset  
27 that the defendant owns or over which the defendant exercises control, directly or  
28 indirectly, as well as any property that is traceable to, derived from, fungible with, or a

1 substitute for property that constitutes the proceeds of the offense(s), or which was used to  
2 facilitate the commission of the offense(s), including the following property:

3 \$1,972,975 in U.S. currency seized from the bank account of  
4 U.S. Company-1 on March 1, 2024.

5 c. The defendant further agrees to waive all interest in any such asset in any  
6 administrative or judicial forfeiture proceeding, whether criminal or civil, state or federal.  
7 The defendant agrees to consent to the entry of orders of forfeiture for such property and  
8 waives the requirements of Federal Rules of Criminal Procedure 32.2 and 43(a) regarding  
9 notice of the forfeiture in the charging instrument, announcement of the forfeiture at  
10 sentencing, and incorporation of the forfeiture in the judgment. The defendant further  
11 understands and agrees that forfeiture of the assets is appropriate and in accordance with  
12 the applicable forfeiture statutes, which may include Title 8 U.S.C. § 1324(b), Title 18  
13 U.S.C. §§ 924(d), 981, 982 and 2253, Title 21 U.S.C. §§ 853 and 881, Title 22 U.S.C.  
14 § 401, Title 28 U.S.C. § 2461(c), and Title 50 U.S.C. § 4819.

15 d. Forfeiture of the defendant's assets shall not be treated as satisfaction of any  
16 fine, restitution, cost of imprisonment, or any other penalty this court may impose upon the  
17 defendant in addition to forfeiture. This agreement does not preclude the United States  
18 from instituting any civil or administrative forfeiture proceedings as may be appropriate  
19 now or in the future.

20 e. The defendant agrees to waive all constitutional and statutory challenges in  
21 any manner (including direct appeal, habeas corpus, double jeopardy or any other means)  
22 to any forfeiture imposed as a result of this guilty plea or any pending or completed  
23 administrative or civil forfeiture actions, including that the forfeiture constitutes an  
24 excessive fine or punishment. The defendant agrees to take all steps as requested by the  
25 United States to pass clear title to forfeitable assets to the United States, and to testify  
26 truthfully in any judicial forfeiture proceeding. The defendant acknowledges that all  
27 property covered by this agreement is subject to forfeiture as proceeds of illegal conduct,  
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1 property facilitating illegal conduct, and substitute assets for property otherwise subject to  
2 forfeiture, and that no other person or entity has a legitimate claim to these items listed.

3 f. The defendant agrees not to file a claim to any of the listed property in any  
4 civil proceeding, administrative or judicial, which may be initiated. The defendant further  
5 agrees that he/she will not contest civil, administrative or judicial forfeiture of the listed  
6 property. The defendant agrees to waive his/her right to notice of any forfeiture proceeding  
7 involving this property, and agrees not to file a claim or assist others in filing a claim in  
8 that forfeiture proceeding.

9 g. The government reserves its right to proceed against any remaining assets  
10 not identified either in this agreement or in any civil actions which are being resolved along  
11 with this plea of guilty, including any property in which the defendant has any interest or  
12 control, if said assets, real or personal, tangible or intangible were involved in the  
13 offense(s).

14 h. The defendant hereby waives, and agrees to hold the government and its  
15 agents and employees harmless from any and all claims whatsoever in connection with the  
16 seizure, forfeiture, and disposal of the property described above. Without limitation, the  
17 defendant understands and agrees that by virtue of this plea of guilty, the defendant will  
18 waive any rights or cause of action that the defendant might otherwise have had to claim  
19 that he/she is a “substantially prevailing party” for the purpose of recovery of attorney fees  
20 and other litigation costs in any related civil forfeiture proceeding pursuant to 28 U.S.C.  
21 § 2465(b)(1).

22 **9. ELEMENTS**

23 To prove the crime of Conspiracy to Violate the AECA and the ITAR, in violation  
24 of 18 U.S.C. § 371, the United States must prove the following elements beyond a  
25 reasonable doubt:

- 26 1. Beginning no later than on or about February 20, 2023, and continuing to on or  
27 about March 1, 2024, in the District of Arizona and elsewhere, an agreement  
28 was formed between two or more persons to willfully export or cause to be

1                   exported from the United States a defense article listed on the United States  
2                   Munitions List without obtaining the requisite license or written approval from  
3                   the United States;

- 4                   2. The defendant became a member of the conspiracy knowing that one of its  
5                   objects was to commit the crime of exporting or causing the export of defense  
6                   articles without lawful authority and intended to help accomplish it; and  
7                   3. One of the members of the conspiracy performed at least one overt act for the  
8                   purpose of carrying out the conspiracy.

9                   To prove the crime of Conspiracy to Violate the ECRA and the EAR, in violation  
10                  of 50 U.S.C. § 4819(a)(1), (a)(2)(D), and (b); and 15 C.F.R. Parts 736.2(b)(1) and 774,  
11                  Supp. No. 1, the United States must prove the following elements beyond a reasonable  
12                  doubt:

- 13                  1. Beginning no later than on or about February 20, 2023, and continuing to on or  
14                  about March 1, 2024, in the District of Arizona and elsewhere, an agreement  
15                  was formed between two or more persons to willfully export or cause to be  
16                  exported from the United States an article listed on the Commerce Control List;  
17                  2. Without obtaining a license or written approval for the export from the United  
18                  States Department of Commerce;  
19                  3. The defendant became a member of the conspiracy knowing that one of its  
20                  objects was to commit the crime of exporting or causing the export of controlled  
21                  articles without lawful authority and intended to help accomplish it; and  
22                  4. The defendant did so willfully.

23                  **10. FACTUAL BASIS**

24                  The defendant admits that the following facts are true and that if this matter were to  
25                  proceed to trial the United States could prove the following facts beyond a reasonable  
26                  doubt:

27                  From at least February 20, 2023, to March 1, 2024, I conspired with Peter  
28                  Biar Ajak and others to purchase, export, or cause to be exported various

1 weapons and ammunition from the United States to the Republic of South  
2 Sudan. My co-conspirators and I wanted to cause the illegal export of these  
3 weapons and ammunition to arm opposition groups seeking to effect a  
non-democratic regime change in South Sudan.

4 These weapons and ammunition included AK-47 rifles (fully automatic),  
5 PKM rifles (fully automatic), RPG-7 launchers, PG-7 HE rounds, FIM-92  
6 Stinger missile systems, M-67 hand grenades, PG-7VT / PG-7T AT rounds,  
PSL sniper rifles, 7.62 x 39 mm ammunition, and 7.62 x 54 mm ammunition.  
The total cost for the weapons and ammunition was \$3,972,975.

8 These weapons and ammunition are designated as defense articles on the  
United States Munitions List or listed on the Commerce Control List. I knew  
9 that these weapons and ammunition required a license from the U.S.  
10 Department of State or the U.S. Department of Commerce before they could  
be exported from the United States to South Sudan, and that neither I nor  
11 anyone else connected with the scheme had obtained such licenses. For  
example, on December 22, 2023, an undercover agent in Phoenix, Arizona,  
12 who was posing as a weapons dealer, told me that shipping the weapons and  
ammunition was illegal because the items require a license to leave the  
country. Similarly, during a February 22, 2024, meeting in Phoenix,  
13 Arizona, the undercover agent told me that the weapons purchase was illegal,  
the weapons required export licenses that the agent had not obtained, and the  
agent would have to bribe United States military members to get the weapons  
14 from the United States to South Sudan.

17 When planning the purchase and export of the \$3,972,975 in weapons and  
ammunition, my co-conspirator Peter Biar Ajak and I did not believe we were  
18 doing so on behalf of, or with permission from, an authorized federal  
government official or agent of the federal government. Rather, because we  
19 knew that exporting the weapons and ammunition without the required  
licenses was illegal, Ajak and I agreed to disguise the shipment as items  
20 related to humanitarian activities in South Sudanese refugee camps. This  
effort included creating a fictitious \$3,972,975 invoice for “consulting  
21 services” related to “human rights, humanitarian, and civic engagement” and  
associated items, when in fact the payments would be for the weapons and  
22 ammunition described above.

25 My co-conspirators also solicited funds to pay for the weapons and  
ammunition and other expenses related to effecting a non-democratic regime  
26 change. Between on or about February 19, 2024, and February 26, 2024, my  
co-conspirators caused \$2 million to be transferred to the undercover agent  
27 in partial payment for the weapons and ammunition. The \$2 million was  
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1 paid in four separate installments and was made in furtherance of the  
2 conspiracy. Another \$1,972,975, which was seized from the bank account  
3 of U.S. Company-1, would have been used to fulfill the remainder of the  
purchase contract.

4 The defendant shall swear under oath to the accuracy of this statement and, if the  
5 defendant should be called upon to testify about this matter in the future, any intentional  
6 material inconsistencies in the defendant's testimony may subject the defendant to  
7 additional penalties for perjury or false swearing, which may be enforced by the United  
8 States under this agreement.

9 **APPROVAL AND ACCEPTANCE OF THE DEFENDANT**

10 I have read the entire plea agreement with the assistance of my attorney. I  
11 understand each of its provisions and I voluntarily agree to it.

12 I have discussed the case and my constitutional and other rights with my attorney.  
13 I understand that by entering my plea of guilty I shall waive my rights to plead not guilty,  
14 to trial by jury, to confront, cross-examine, and compel the attendance of witnesses, to  
15 present evidence in my defense, to remain silent and refuse to be a witness against myself  
16 by asserting my privilege against self-incrimination, all with the assistance of counsel, and  
17 to be presumed innocent until proven guilty beyond a reasonable doubt.

18 I agree to enter my guilty plea as indicated above on the terms and conditions set  
forth in this agreement.

19 I have been advised by my attorney of the nature of the charges to which I am  
20 entering my guilty plea. I have further been advised by my attorney of the nature and range  
21 of the possible sentence and that my ultimate sentence shall be determined by the Court  
22 after consideration of the advisory Sentencing Guidelines.

23 My guilty plea is not the result of force, threats, assurances, or promises, other than  
24 the promises contained in this agreement. I voluntarily agree to the provisions of this  
25 agreement and I agree to be bound according to its provisions.

26 I understand that if I am granted probation or placed on supervised release by the  
Court, the terms and conditions of such probation/supervised release are subject to

1 modification at any time. I further understand that if I violate any of the conditions of my  
 2 probation/supervised release, my probation/supervised release may be revoked and upon  
 3 such revocation, notwithstanding any other provision of this agreement, I may be required  
 4 to serve a term of imprisonment or my sentence otherwise may be altered.

5 This written plea agreement, and any written addenda filed as attachments to this  
 6 plea agreement, contain all the terms and conditions of the plea. Any additional  
 7 agreements, if any such agreements exist, shall be recorded in a separate document and  
 8 may be filed with the Court under seal; accordingly, additional agreements, if any, may not  
 9 be in the public record.

10 I further agree that promises, including any predictions as to the Sentencing  
 11 Guideline range or to any Sentencing Guideline factors that will apply, made by anyone  
 12 (including my attorney) that are not contained within this written plea agreement, are null  
 13 and void and have no force and effect.

14 I am satisfied that my defense attorney has represented me in a competent manner.

15 I fully understand the terms and conditions of this plea agreement. I am not now  
 16 using or under the influence of any drug, medication, liquor, or other intoxicant or  
 17 depressant that would impair my ability to fully understand the terms and conditions of this  
 18 plea agreement.

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8/25/2025

21 Date



ABRAHAM CHOL KEECH  
Defendant

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#### APPROVAL OF DEFENSE COUNSEL

25 I have discussed this case and the plea agreement with my client in detail and have  
 26 advised the defendant of all matters within the scope of Fed. R. Crim. P. 11, the  
 27 constitutional and other rights of an accused, the factual basis for and the nature of the  
 28 offense to which the guilty plea will be entered, possible defenses, and the consequences

1 of the guilty plea including the maximum statutory sentence possible. I have further  
2 discussed the concept of the advisory Sentencing Guidelines with the defendant. No  
3 assurances, promises, or representations have been given to me or to the defendant by the  
4 United States or any of its representatives that are not contained in this written agreement.  
5 I concur in the entry of the plea as indicated above and that the terms and conditions set  
6 forth in this agreement are in the best interests of my client. I agree to make a bona fide  
7 effort to ensure that the guilty plea is entered in accordance with all the requirements of  
8 Fed. R. Crim. P. 11.

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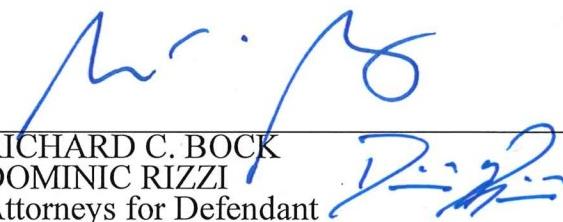
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Date

0/25/25

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RICHARD C. BOCK  
DOMINIC RIZZI  
Attorneys for Defendant

1                   **APPROVAL OF THE UNITED STATES**

2                   I have reviewed this matter and the plea agreement. I agree on behalf of the United  
3                   States that the terms and conditions set forth herein are appropriate and are in the best  
4                   interests of justice.

5                   TIMOTHY COURCHAINE  
6                   United States Attorney  
7                   District of Arizona

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**8/25/25**

9                   Date



10                  AMY C. CHANG  
11                  RAYMOND K. WOO  
12                  M. BRIDGET MINDER  
13                  Assistant U.S. Attorneys  
14                  LESLIE C. ESBROOK  
15                  CHRISTOPHER M. COOK  
16                  Trial Attorneys, National Security Division

17                   **ACCEPTANCE BY THE COURT**

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**8/25/2025**

19                   Date



20                  HONORABLE STEVEN P. LOGAN  
21                  United States District Judge

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